

Rocky Flats Environmental Technology Site P.O. Box 464
Golden, Colorado 80402-0464
Phone: (303) 966-2729
Fax: (303) 966-8244

December 12, 1996

96-RM-TA-0220-KH

Randy Leitner, Program Manager Compliance & Performance Assurance Building T130C Kaiser-Hill

REQUEST FOR DEFERRAL OF RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) CLOSURES FOR RCRA UNITS 90.37 AND 90.39 GLOVEBOX UNITS IN BUILDING 779 - GRK-315-96

Action:

Transmit RCRA closure deferral request

Pursuant to the Site RCRA Part B Permit, Part VIII, Section 5.5.iv, Rocky Mountain Remediation Services, L.L.C., (RMRS) requests that the RCRA closure of mixed residue glovebox units 90.37 and 90.39 be deferred until decontamination and decommissioning of Building 779 commences. The discoloration of the glovebox surfaces is indicative that the closure performance standard for a clean surface cannot be reasonably attained for the gloveboxes in these units. All RCRA-regulated waste has been removed from the gloveboxes and they have been verified to be empty. This stable configuration poses little if any threat to human health and the environment. Quarterly inspections will verify this continued condition.

Draft transmittal letters to the Department of Energy, Rocky Flats Field Office (DOE, RFFO) and to the Colorado Department of Public Health and Environment (CDPHE) are attached. We request that this request for deferral be transmitted to DOE, RFFO at your earliest convenience.

If you have questions, please contact me at extension 2729, or Natalie Van Tyne at extension 5893.

Gary R. Konwinski, Manager Performance Assurance

NCTVT

Attachments: As Stated (2)

R.M. Leitner 96-RM-TA-0220-KH/GRK-315-96 Page 2

cc:

KH (B441) R.V. Morgan KH (T130C) K. North SSOC (B779) M.H. Conilogue W.M. Wierzbicki SSOC (B750) LATA (T750Á) M.T. Stanley RMRS (T130F) G.D. Guinn RMRS (T130F) RMRS (B080) C.C. Jierree RMRS Records Center -RMRS (T130F) File

R.M. Leitner GRK-xxx-97 Page 2

Gary R. Konwinski, Manager Performance Assurance

NCTVT

Attachments: As Stated (2)

CC:

| R.V. Morgan | - | KH (B441) |
|----------------------------|----------|--------------|
| K. North | - | KH (T130C) |
| M.H. Conilogue | • | SSOC (B779) |
| W.M. Wierzbicki | • | SSOC (B750) |
| M.T. Stanley | • | LATA (B779) |
| G.D. Guinn | • | RMRS (T130F) |
| F.P. Hughes | - | RMRS (T130B) |
| RMRS Records Center | <u>-</u> | RMRS (B116) |
| File | _ | RMRS (T130F) |



Rocky Flats Environmental Technology Site P.O. Box 464 Golden, Colorado 80402-0464 Phone:(303) 966-2729

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February 24, 1997

Randy Leitner, Program Manager Compliance & Performance Assurance Building T130C Kaiser-Hill

REQUEST FOR DEFERRAL OF RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) CLOSURES FOR RCRA UNITS 90.37 (ROOM 131, GLOVEBOXES 131A, 131B, 131D, AND 131E), 90.39 (ROOM 137, GLOVEBOXES 106-3, 106-4 AND 106-5), AND 90.43 (ROOM 160, GLOVEBOX 860) IN BUILDING 779 - GRK-xxx-97

Action:

Transmit RCRA closure deferral request

084

Pursuant to the Site RCRA Part B Permit, Part VIII, Section B. c. iv. and v., and to the Notification to Begin Closure of Three Permitted RCRA Units in Building 779, et al (GRK-282-96), Rocky Mountain Remediation Services, L.L.C., (RMRS) requests that the RCRA closure of mixed residue glovebox units 90.37 (Room 131, Gloveboxes 131A, 131B, 131D, AND 131E), 90.39 (Room 137, Gloveboxes 106-3, 106-4 AND 106-5), AND 90.43 (Room 160, Glovebox 860) be deferred until decontamination and decommissioning of Building 779 commences.

The discoloration of the glovebox surfaces in Units 90.37 (Room 131, Gloveboxes 131A, 131B, 131D, and 131E), 90.39 (Room 137, Gloveboxes 106-3, 106-4 and 106-5) is indicative that the closure performance standard for a clean surface cannot be reasonably attained for the gloveboxes in these units. Unit 90.43 (Room 160, Glovebox 860) previously contained listed hazardous waste, and would require rinsing and sampling to meet the closure performance standard. Due to the configuration of fixed equipment in the glovebox, and the extent of radiological contamination present, it would not be cost effective to attempt to achieve clean closure in this glovebox at this time.

All RCRA-regulated waste has been removed from all of the gloveboxes, and they have been verified to be empty. This stable configuration poses little if any threat to human health and the environment. Quarterly inspections will verify this continued condition.

Draft transmittal letters to the Department of Energy, Rocky Flats Field Office (DOE, RFFO) and to the Colorado Department of Public Health and Environment (CDPHE) are attached. We request that this request for deferral be transmitted to DOE, RFFO at your earliest convenience.

If you have questions, please contact me at extension 2729, or Natalie Van Tyne at extension 5893.